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September 10, 2014

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, *et al.*
Case No. 09-50026 (REG)**

**Revised Scheduling Orders and Stay Stipulations
In Connection With Additional Motions to Enforce**

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. On September 2, 2014, New GM filed with the Court two (2) notices of presentment of scheduling orders in connection with New GM’s Pre-Closing Accident Motion to Enforce and its Monetary Relief Motion to Enforce. Attached as an exhibit to each proposed scheduling order was a form Stay Stipulation that New GM was asking each plaintiff to enter into to stay their individual Actions. The objection deadline for the proposed scheduling orders was 5:00 p.m. on Tuesday, September 9, 2014.

Since filing the notices of presentment, we have been contacted by certain of the plaintiffs who had comments on the proposed Scheduling Orders and the forms of the Stay Stipulations, including those from Designated Counsel and from counsel for Doris Powledge. We have accepted these comments, and revised versions of the proposed Scheduling Orders and Stay Stipulations (along with a redline of each showing the changes from the original versions) are enclosed herewith. Specifically, (i) Exhibit “1” attached hereto contains a clean and redlined version of the proposed Scheduling Order (with the Stay Stipulation as Exhibit “A”) for the Pre-Closing Accident Motion to Enforce, and (ii) Exhibit “2” attached hereto contains a clean and

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redlined version of the proposed Scheduling Order (with the Stay Stipulation as Exhibit "A") for the Monetary Relief Motion to Enforce.

If the Court has any questions or needs anything further, please let me know.

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd
Encl.

cc: All Counsel for Plaintiffs (or *pro se* Plaintiffs) in the
Pre-Closing Accident Lawsuits and the Monetary Relief Actions
Designated Counsel
Counsel for the Groman Plaintiffs
Counsel for the GUC Trust
Counsel for the Unitholders